

1 Leon Dayan, SBN 153162
2 Abigail V. Carter*
3 Ramya Ravindran*
4 Lane M. Shadgett*
5 J. Alexander Rowell*
6 **BREDHOFF & KAISER P.L.L.C.**
7 805 Fifteenth Street NW, Suite 1000
8 Washington, D.C. 20005
9 Tel. (202) 842-2600
10 Fax (202) 842-1888
11 ldayan@bredhoff.com
12 acarter@bredhoff.com
13 rravindran@bredhoff.com
14 lshadgett@bredhoff.com
15 arowell@bredhoff.com
16 *Application *pro hac vice* pending

17 Daniel Feinberg, SBN 135983
18 Catha Worthman, SBN 230399
19 Anne Weis, SBN 336480
20 **FEINBERG, JACKSON, WORTHMAN**
21 **& WASOW, LLP**
22 2030 Addison Street, Suite 500
23 Berkeley, CA 94704
24 Tel. (510) 269-7998
25 Fax (510) 269-7994
26 dan@feinbergjackson.com
27 catha@feinbergjackson.com
28 anne@feinbergjackson.com

Attorneys for Plaintiffs (Additional Counsel not listed)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03070-JD

**DECLARATION OF ANDREA
PARKER**

Declaration of Andrea Parker
Case No. 3:25-cv-03070-JD

DECLARATION OF ANDREA PARKER

I, Andrea Parker, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the President of Local 1340 of the National Federation of Federal Employees (“NFFE”). NFFE is a national labor organization and unincorporated membership organization headquartered in Washington, D.C.

3. Nationwide, NFFE represents approximately 110,000 federal workers, approximately 10,000 of whom are dues-paying members, from agencies across the federal government.

4. NFFE Local 1340 represents approximately 505 employees working at the Federal Aviation Administration- William J. Hughes Technical Center. NFFE members include professional and non-professional staff consisting of civil engineers, computer scientists, airport safety specialists, airport research specialists, air traffic control specialists, research psychologists, IT security, IT systems analyst, aerospace engineers, and technicians.

5. Since January 20th, 2025, NFFE Local 1340 has demanded to bargain over Trump administration policies including the return to in-office work and telework. NFFE has also placed multiple requests for information necessary to represent its bargaining unit employees.

6. NFFE’s Officers and stewards represent employees primarily on official time which the Executive Order abolishes. Our members perform much of their representation using agency equipment such as computers, computer systems and phones, also abolished by the Executive Order. The loss of official time and use of agency equipment will significantly impact our ability to represent our members.

7. NFFE represents our federal sector members through negotiating collective bargaining agreements and assisting employees with enforcing them. We assert contractual and statutory rights on behalf of our federal sector members by filing grievances, unfair labor practice charges, or other complaints through our negotiated grievance procedure or with various

1 federal agencies, including the Federal Labor Relations Authority, the Merit Systems Protection
2 Board, the Office of Special Counsel, and the Federal Labor Relations Authority. NFFE files
3 litigation on employees' behalf in the courts. We also advocate on Capitol Hill and in the media
4 on issues of importance to federal workers.

5 8. NFFE's operations are funded solely by members who pay dues to be members of
6 the union, almost exclusively through Agency dues withholding. NFFE will be financially
7 harmed if the Executive Order is implemented because it will immediately lose dues revenue
8 from members who are covered by the Executive Order. In that event, NFFE would immediately
9 lose hundreds of thousands of dollars of revenue. NFFE currently does not have a mechanism to
10 maintain membership of union members replacing Agency dues withholding.

11 9. NFFE's ability to carry out its mission will be severely curtailed if union
12 members no longer have collective bargaining rights and cannot pay dues to NFFE through
13 Agency dues withholding. For example, NFFE would not have the ability to maintain current
14 staff levels, help with training union leaders, assisting with grievances, negotiating collective
15 bargaining agreements, advocating for employees on Capitol hill, and filing litigation on behalf
16 of the employees we represent.


17 10. The union has played an integral role in fostering a strong culture of safety at the
18 FAA William J. Hughes Technical Center (WJHTC). Through active participation in safety
19 programs and collaborative initiatives, the union has been instrumental in achieving measurable
20 improvements in workplace safety. This engagement by the union has led to a notable reduction
21 in safety-related incidents, which in turn has decreased the agency's exposure to the costs
22 associated with adverse events. Eliminating the union-agency relationship would significantly
23 undermine these achievements, potentially increasing safety incidents and operational costs
24 while negatively impacting staff morale and well-being.

25 11. NFFE members pay dues voluntarily as federal employees.

26 12. We have heard from members who are concerned about NFFE losing strength and
27 bargaining power because of the threat of diminished membership and smaller bargaining units.

1 NFFE leverages its size and the fact we represent approximately 110,000 federal employees
2 when advocating in the media or to Congress and when bargaining with agencies. The Executive
3 Order stands to reduce NFFE's size and capacity, thereby curbing our abilities to advocate for
4 positive change for federal workers.

5
6 I declare under penalty of perjury under the laws of the United States that the foregoing is
7 true and correct. Executed April 1st, 2025, in New Jersey.

8 
Andrea D Parker (Apr 1, 2025 18:29 EDT)

9

Andrea Parker